

### REMARKS

Claims 6-21 remain in the present application. Claims 1-5 are hereby canceled without prejudice against further prosecution in a continuation or continuation-in-part application. Claims 11-14, 18-19 and 24 are hereby amended. No new matter is being added.

#### Objections to the Specification

The specification was objected to for various informalities. Applicants have hereby amended the specification per the recommendations of the Examiner in order to correct these informalities. Hence, applicants respectfully submit that these objections are now overcome.

#### Objections to the Claims

Claims 1, 4 and 12 were objected to for reasons relating to antecedent basis. Claim 12 has been amended per the Examiner's recommendation. While claims 1 and 4 are hereby canceled, claims 6 and 8 (which now incorporate the limitations of claims 1 and 4) have been amended so as to be in accordance with the Examiner's recommendations. Hence, applicants respectfully submit that these objections are now overcome.

#### Allowable Subject Matter

Claims 6 and 8 were objected to but were deemed to be allowable if rewritten in independent form. Claims 6 and 8 are hereby amended so as to put them in independent form. In particular, claim 6 as amended now includes limitations from original claims 1-4, and claim 8 as amended now includes limitations from original claims 1-4 and 7. Hence, applicants respectfully submit that claims 6 and 8 are now in form for allowance.

Claim 7 is hereby amended so as to depend from allowable claim 6. Hence, applicants respectfully submit that claim 7 is now also allowable.

Claim 9-11 are hereby amended so as to depend from allowable claim 8. Hence, applicants respectfully submit that claims 9-11 are now also allowable.

#### Claim Rejections -- 35 USC 102

Claims 12-21 stand rejected under 35 USC 102 as being anticipated by Sullivan et al. (USP 5,070,413). Claims 12-13, 15, and 17-21 are hereby amended. This rejection is respectfully traversed in regards to the claims as amended.

As amended, claim 12 now recites as follows.

12. A method of blurring a **two-dimensional** segment of an image, the method comprising:  
selecting the two-dimensional segment;  
identifying boundary pixels in a **boundary region** near a border between the two-dimensional segment and one or more adjacent two-dimensional segments;  
determining blur contributions to the boundary pixels from the one or more adjacent two-dimensional segments; and  
adding the blur contributions to color vectors of the boundary pixels to add blurring to the two-dimensional segment.

(Emphasis added.)

As recited above, claim 12 now recites a method of blurring a **two-dimensional** segment of an image. As described in the present application, an image may be partitioned “into a set of non-overlapping parts, or segments, that together constitute the entire image.” (Present application, page 7, first paragraph.) For example, an image may be divided into a background segment and one or more foreground segments. (Present application, page 7, third paragraph.)

The claimed method requires, among other limitations, identifying boundary pixels in a **boundary region** near a border between the two-dimensional segment and one or more adjacent two-dimensional segments. Examples of such boundary pixels are

described in the present application. FIG. 2 is one such example showing two adjacent segments **21** and **22** and a boundary region **23** of segment **21**. For convenience, FIG. 2 is reproduced below.

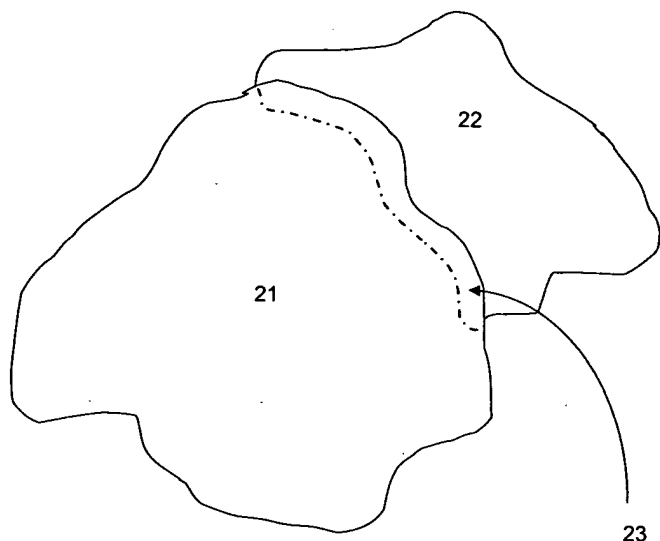


FIG. 2

Sullivan et al. pertains to a “halftoning method for creating a color binary image from a continuous tone color image or computer generated graphics signal”. Sullivan et al. discloses including a “visual color blur function in a recursive error propagation algorithm so that perceived color vector rather than binary color error is propagated.” (Sullivan et al., Abstract.)

As such, Sullivan et al. does not pertain to **two-dimensional** segments of an image. Moreover, Sullivan et al. does not identify boundary pixels in a **boundary region** near a border between a segment and one or more adjacent segments.

For at least the above-discussed reasons, applicant respectfully submits that claim 12, as amended, is now patentably distinguished over Sullivan et al.

Claims 13-18 depend from amended claim 12. Hence, claims 13-18 are also now patentably distinguished over Sullivan et al.

Claim 19 has been amended to recite as follows.

19. An apparatus for determining blur contributions to a particular **two-dimensional** segment from adjacent two-dimensional segments of an image, the apparatus comprising:  
means for selecting the particular two-dimensional segment;  
means for identifying boundary pixels in a **boundary region** near a border between the particular two-dimensional and one or more adjacent two-dimensional segments; and  
means for determining the blur contributions for the boundary pixels from the adjacent two-dimensional segments.

(Emphasis added.)

Claim 19, as amended, now recites an apparatus for determining blur contributions to a particular **two-dimensional** segment from adjacent two-dimensional segments. In addition, claim 19 now requires means for identifying boundary pixels in a **boundary region** near a border between a two-dimensional segment and one or more adjacent two-dimensional segments.

In contrast, as discussed above, Sullivan et al. does not pertain to **two-dimensional** segments of an image. Moreover, Sullivan et al. does not identify boundary pixels in a **boundary region** near a border between a segment and one or more adjacent segments.

Hence, for at least the above-discussed reasons, applicant respectfully submits that claim 19, as amended, is now patentably distinguished over Sullivan et al.

Claims 20-21 depend from amended claim 19. Hence, claims 20-21 are also now patentably distinguished over Sullivan et al.

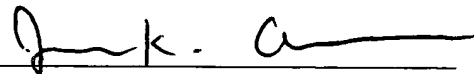
Conclusion

Applicants respectfully submit that claims 6-21, as amended, are now patentably distinct over the cited art. Favorable action is respectfully requested.

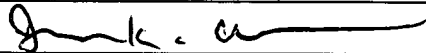
Respectfully submitted,  
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